

# PAUL HASTINGS

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October 7, 2022

## VIA ECF

Hon. Lorna G. Schofield  
United States District Court Judge  
U.S. Courthouse, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Ulku Rowe v. Google LLC, No. 19-cv-08655 (LGS)

Dear Judge Schofield:

We are writing jointly in response to Your Honor's September 27, 2022 Order concerning settlement discussions and availability for trial in the first half of 2023.

First, the parties have agreed to conduct further settlement discussions and split the costs of a private mediator.

Second, the parties and counsel have the following scheduling conflicts during the first half of 2023:

Conflict	Reason
January 1-3, 2023	Key witness pre-paid vacation (Google)
January 17-27, 2023	Trial in D. Mass (Attorney Greene)
January 30-February 2, 2023	Pre-paid vacation (Attorney Greene)
February 8-13, 2023	Personal (Attorney Greene's son's Army graduation)
February 16-21, 2023	Key witness pre-paid vacation (Google)
March 1, 2023	Key witness pre-paid vacation (Google)
March 13-17, 2023	JAMS arbitration Philadelphia (Attorneys Gage and Tomezsko)
April 3-9, 2023	Key witness pre-paid vacation (Google)
May 1-5, 2023	JAMS arbitration Philadelphia (Attorneys Gage and Tomezsko)

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May 8-14, 2023	Key witness pre-paid vacation (Google)
June 8-16, 2023	AAA arbitration New York (Attorney Tomezsko)
June 17-24, 2023	Key witness pre-paid vacation (Google)
June 5-30, 2023	Trial in S.D.N.Y. (Attorney Greene)

Given the above conflicts, the parties' preferred timing for a trial in this matter would be during the period between April 10 and April 28, 2023, if Your Honor's calendar can accommodate.

Respectfully,

/s/ Kenneth W. Gage  
Kenneth W. Gage  
Sara B. Tomezsko  
of PAUL HASTINGS LLP

/s/ Cara E. Greene  
Cara E. Greene  
Shira Z. Gelfand  
of OUTTEN & GOLDEN LLP